

# EXHIBIT “C”

## COLLECTIVE EMAIL CORRESPONDENCE WITH COUNSEL

**Jessica L. Rice**

---

**From:** Vincent, Leonard <LVINCENT@mdoc.state.ms.us>  
**Sent:** Saturday, May 2, 2020 11:57 AM  
**To:** Marcy Croft  
**Cc:** Jessica L. Rice; Trey Jones; Mary Clark Joyner; Chan E. McLeod; Carson Thurman; KRISSY NOBILE; Karen Howell; Gary Bufkin; Cody Bailey; David Kaufman; Garrig Shields; Molly Walker; wmanuel@bradley.com  
**Subject:** Re: Legal Mail  
  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Legal mail is opened in front of the inmate to check for contraband. It is not read by the officer. Cameras are not allowed in the units. Officers do not take pictures of their mail

Leonard C. Vincent  
General Counsel  
Mississippi Department of Corrections  
301 North Lamar Street  
Suite 301-8  
Jackson, MS 39201  
lvincent@mdoc.state.ms.us  
Office: 601 359 5337  
Fax: 601 359 6178  
Cell: 662 719 8179

PRIVILEGED AND CONFIDENTIAL COMMUNICATION: The information contained in this electronic message and any attachments to it are intended for the exclusive use of the addressees and may contain confidential attorney-client communication and/or privileged information. If you are not the intended recipient, please destroy all copies of this message and attachments and immediately notify this office by sending a reply e-mail to the sender. Thank you.

Sent from my iPhone

On May 1, 2020, at 6:24 PM, Marcy Croft <MCroft@maronmarvel.com> wrote:

All: We are hearing from families that our mail was finally given to at least some of our clients today. Thank you. However, we are also hearing that officers are taking pictures of the contents and envelopes as well as refusing to give our clients the return envelopes we sent with our letter.

We would appreciate it if you would follow up on these complaints to clear up any confusion and ensure that our clients receive the entire contents of the mail we sent them. It is inappropriate for any documentation to be removed from our legal mail.

Thank you.

- Marcy

Marcy Croft | Attorney at Law  
D: 601-960-8630 | mcroft@maronmarvel.com

bio<<https://www.maronmarvel.com/attorneys/Marcy-Croft>> |  
vcard<<https://www.maronmarvel.com/attorneys/Marcy-Croft/vcard>> |  
[<https://esig365snippets.blob.core.windows.net/images/7E1D9365-6828-4F74-A4BC-9AEFC143F6A8/linkedin-icon.png>] <<https://www.linkedin.com/company/maron-marvel-bradley-&-anderson>>  
[<https://esig365snippets.blob.core.windows.net/images/7E1D9365-6828-4F74-A4BC-9AEFC143F6A8/mm-logo.gif>]  
PO Box 22803  
Jackson, MS 39225-2803 | M: 601-812-6630 | F: 601-206-0119  
[www.maronmarvel.com](http://www.maronmarvel.com) | <<http://www.maronmarvel.com>>  
[<https://esig365snippets.blob.core.windows.net/images/7E1D9365-6828-4F74-A4BC-9AEFC143F6A8/facebook-high4.png>] <<https://www.facebook.com/MaronMarvel/>>  
<<https://www.facebook.com/MaronMarvel/>>

This email is covered by the Electronic Communications Privacy Act, 18 U.S.C. §§ 2510-2521 and is legally privileged. The information contained in this communication is confidential, is subject to the attorney-client privilege, may constitute inside information, and is intended only for the use of the addressee. It is the property of Maron Marvel Bradley Anderson & Tardy LLC. Unauthorized use, disclosure or copying of this communication or any part thereof is strictly prohibited and may be unlawful. If you have received this communication in error, please notify us immediately by return e-mail, and destroy this communication and all copies thereof, including all attachments.

On Apr 30, 2020, at 10:14 PM, Vincent, Leonard <LVINCENT@mdoc.state.ms.us> wrote:

I checked and the post office is open and receiving and sending out mail. I was told to give them the name or names of inmates that claim to have had a problem and they would check on it

Leonard C. Vincent  
General Counsel  
Mississippi Department of Corrections  
301 North Lamar Street  
Suite 301-8  
Jackson, MS 39201  
lvincent@mdoc.state.ms.us  
Office: 601 359 5337  
Fax: 601 359 6178  
Cell: 662 719 8179

PRIVILEGED AND CONFIDENTIAL COMMUNICATION: The information contained in this electronic message and any attachments to it are intended for the exclusive use of the addressees and may contain confidential attorney-client communication and/or privileged information. If you are not the intended recipient, please destroy all copies of this message and attachments and immediately notify this office by sending a reply e-mail to the sender. Thank you.

Sent from my iPhone

On Apr 30, 2020, at 8:36 PM, Marcy Croft <MCroft@maronmarvel.com> wrote:

I meant to include everyone on the email below. Resending now.

Marcy Croft  
Attorney at Law  
Maron Marvel Bradley Anderson & Tardy LLC  
PO Box 22803  
Jackson, MS 39225-2803  
601-812-6630 (Main)  
601-960-8630 (Direct)  
601-206-0119 (Fax)  
mcroft@maronmarvel.com  
[www.maronmarvel.com](http://www.maronmarvel.com)<<http://www.maronmarvel.com>>

This email is covered by the Electronic Communications Privacy Act, 18 U.S.C. §§ 2510-2521 and is legally privileged. The information contained in this communication is confidential, is subject to the attorney-client privilege, may constitute inside information, and is intended only for the use of the addressee. It is the property of Maron Marvel Bradley Anderson & Tardy LLC. Unauthorized use, disclosure or copying of this communication or any part thereof is strictly prohibited and may be unlawful. If you have received this communication in error, please notify us immediately by return e-mail, and destroy this communication and all copies thereof, including all attachments.

On Apr 30, 2020, at 6:27 PM, Marcy Croft <MCroft@maronmarvel.com> wrote:

Trey: Clients are saying they are unable to send and/or receive mail right now. (We sent letters to a number of clients last week.) It's not appropriate to hold their incoming/outgoing mail. Our clients (and everyone else at Parchman) need to be able to receive, read, and send correspondence to/from their attorneys. Could you please check with MDOC and have this issue rectified ASAP? Thank you.

- Marcy

**RE: Lang - MDOC's answer**

Cody Bailey [cbailey@brunini.com]

**Sent:** Tuesday, July 28, 2020 5:06 PM

**To:** Marcy Croft

**Cc:** Carson Thurman; Trey Jones [TJones@brunini.com]; Karen Howell [KHowell@brunini.com]; Gary Bufkin

**Categories:** MDOC Emails

**Attachments:** Lang - Motion for Extensi~1.docx (23 KB)

---

Marcy, thanks. Sorry I am just now getting back on this. We think a status conference in Amos or Lang would be premature given that the Court has not yet ruled on the motion for TRO/PI and the MDOC Defendants have not yet responded to the complaints. Attached is a rough draft of our motion for extension of time to respond to the Lang complaint and to stay the Rule 16 initial order until after such answer is filed. Right now, it says the Plaintiffs consent to both of these requests, but if Plaintiffs do not consent to Defendants' request to stay the Rule 16 initial order, just let me know and we can make that clarification before filing. We don't mean to be presumptuous on that point. Thanks.

Cody

Cody C. Bailey

E: <mailto:cbailey@brunini.com>

P: 601-973-8790 F: 601-960-6902

Brunini, Grantham, Grower & Hewes, PLLC

The Pinnacle Building

190 East Capitol St, Suite 100, Jackson, MS 39201

Post Office Drawer 119, Jackson, MS 39205

**Confidentiality Statement**

The information contained in this electronic message from the law firm of Brunini, Grantham, Grower & Hewes, PLLC is confidential or privileged. The information is intended to be for the use of the individual or entity named above. If you are not the intended recipient, be aware that any disclosure, copying, distribution or use of the contents of this message is prohibited. If you have received this electronic message in error, please notify us immediately by telephone at (601) 948-3101.

-----Original Message-----

From: Marcy Croft [mailto:MCroft@maronmarvel.com]

Sent: Tuesday, July 28, 2020 10:04 AM

To: Cody Bailey <cbailey@brunini.com>

Cc: Carson Thurman <cthurman@carrollbufkin.com>; Trey Jones <TJones@brunini.com>; Karen Howell <KHowell@brunini.com>; Gary Bufkin <tgb@carrollbufkin.com>

Subject: Re: Lang - MDOC's answer

Cody: I don't have a problem extending the time to answer at all. We can leave it open as we will end up amending both complaints.

We would like to request a status conference with the Court to work on scheduling, discovery, class certification briefing, etc.. Any objection to requesting a conference date from the Court?

- Marcy

Marcy Croft | Attorney at Law

D: 601-960-8630 | mcroft@maronmarvel.com

bio<<https://www.maronmarvel.com/attorneys/Marcy-Croft>> |

vcad<<https://www.maronmarvel.com/attorneys/Marcy-Croft/vcard>> |

[<https://esig365snippets.blob.core.windows.net/images/7E1D9365-6828-4F74-A4BC-9AEFC143F6A8/linkedin-icon.png>] <<https://www.linkedin.com/company/maron-marvel-bradley-&-anderson>>

[<https://esig365snippets.blob.core.windows.net/images/7E1D9365-6828-4F74-A4BC-9AEFC143F6A8/mm-logo.gif>]

PO Box 22803

Jackson, MS 39225-2803 | M: 601-812-6630 | F: 601-206-0119

[www.maronmarvel.com](http://www.maronmarvel.com) | <<http://www.maronmarvel.com/>>

[<https://esig365snippets.blob.core.windows.net/images/7E1D9365-6828-4F74-A4BC-9AEFC143F6A8/facebook-high4.png>] <<https://www.facebook.com/MaronMarvel/>>

<<https://www.facebook.com/MaronMarvel/>>

This email is covered by the Electronic Communications Privacy Act, 18 U.S.C. §§ 2510-2521 and is legally privileged. The information contained in this communication is confidential, is subject to the attorney-client privilege, may constitute inside information, and is intended only for the use of the addressee. It is the property of Maron Marvel Bradley Anderson & Tardy LLC. Unauthorized use, disclosure or copying of this communication or any part thereof is strictly prohibited and may be unlawful. If you have received this communication in error, please notify us immediately by return e-mail, and destroy this communication and all copies thereof, including all attachments.

On Jul 28, 2020, at 9:43 AM, Cody Bailey <cbailey@brunini.com> wrote:

Marcy and Carson,

The MDOC Defendants' response to the Lang complaint is due Thursday. We request an extension of time to respond. Because the Lang lawsuit and the Amos lawsuit present related claims, we would like to be able to file our response to the Lang complaint 30 days after the Court rules on the Amos Motion for TRO/PI. Would you agree to that?

Thanks,  
Cody

Cody C. Bailey  
E: cbailey@brunini.com<mailto:cbailey@brunini.com>  
P: 601-973-8790 F: 601-960-6902

[<http://www.brunini.com/wp-content/uploads/2016/06/BGGH-FullLogo.gif>]

The Pinnacle Building  
190 East Capitol St, Suite 100, Jackson, MS 39201 Post Office Drawer 119, Jackson, MS 39205

[www.brunini.com](http://www.brunini.com)<<http://www.brunini.com>>  
Bio<<http://www.brunini.com/attorneys-94.html>> / V-Card<<http://www.brunini.com/vcard-94.vcf>>

#### Confidentiality Statement

The information contained in this electronic message from the law firm of Brunini, Grantham, Grower & Hewes, PLLC is confidential or privileged. The information is intended to be for the use of the individual or entity named above. If you are not the intended recipient, be aware that any disclosure, copying, distribution or use of the contents of this message is prohibited. If you have received this electronic message in error, please notify us immediately by telephone at (601) 948-3101.